

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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|--------------------------------------|---|-----------------------|
| SEOUL SEMICONDUCTOR CO., LTD., a |) | |
| Korean corporation, and SEOUL VIOSYS |) | |
| CO., LTD., a Korean corporation, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C.A. No. 24-579 (JNR) |
| |) | |
| TECHNICAL CONSUMER PRODUCTS, |) | |
| INC. d/b/a TCP LIGHTING, |) | |
| |) | |
| Defendant. |) | |

JOINT CLAIM CONSTRUCTION CHART

Pursuant to Paragraph 6 the Court’s Scheduling Order (D.I. 33), Plaintiffs Seoul Semiconductor Co., Ltd. and Seoul Viosys Co., Ltd. (collectively “Seoul”) and defendant Technical Consumer Products, Inc. d/b/a TCP Lighting (“TCP”) have met and conferred, and hereby submit their Joint Claim Construction Chart in the attached Exhibit A. Each party reserves the right to supplement the Joint Claim Construction Chart with additional evidence and to rely upon additional intrinsic evidence and/or extrinsic evidence in their claim construction briefs, including to rebut evidence or arguments made by the other party, and to rely upon the other party’s identified intrinsic evidence.

In addition to setting forth the parties’ agreed upon constructions, the Joint Claim Construction Chart also identifies the terms that remain in dispute, each sides’ proposed constructions along with citation to the intrinsic record that may be cited in support of those constructions, and the requesting side’s explanation why resolution makes difference. Each party reserves the right to rely on intrinsic evidence cited by the other party. The exhibits to this joint filing are:

- A. Joint Claim Construction Chart
- B. U.S. Patent No. 11,721,675
- C. U.S. Patent No. 11,632,836
- D. U.S. Patent No. 10,510,933
- E. U.S. Patent No. 8,659,050
- F. U.S. Patent No. 10,134,967
- G. U.S. Patent No. 9,147,821
- H. U.S. Patent No. 7,982,207
- I. U.S. Patent No. 9,929,314
- J. U.S. Patent No. 8,604,496
- K. U.S. Patent No. 9,799,800
- L. File History of U.S. Patent No. 8,659,050 at SEOUL 000553-55; 000564-71
- M. File History of U.S. Patent No. 10,134,967 at SEOUL 001785-816; 001840-43; 001867-85; 001946-58
- N. File History of U.S. Patent No. 9,799,800 at SEOUL 001235-44
- O. *Satco Products, Inc. v. Seoul Semiconductor*, IPR2020-00410, Paper No. 47
- P. Excerpts of the File History of U.S. Patent No. 10,134,967.
- Q. Excerpts of the File History of U.S. Patent No. 11,632,836.
- R. Excerpts of the File History of U.S. Patent No. 9,799,800.
- S. Excerpts of the File History of U.S. Patent No. 9,929,314.
- T. Excerpts of the File History of U.S. Patent No. 7,964,943.
- U. Excerpts of the File History of U.S. Patent No. 8,319,248.
- V. Excerpts of the File History of U.S. Patent No. 8,558,270.
- W. Excerpts of the File History of U.S. Patent No. 8,829,552.
- X. Excerpts of the File History of U.S. Patent No. 9,412,913.
- Y. Excerpts of the File History of U.S. Patent No. 9,530,942.
- Z. Excerpts of the File History of U.S. Reissue Patent Application No. 16/953,254 File.
- AA. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 17 (Patent Owner Response).
- BB. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 18 (Patent Owner's Motion to Amend Under 37 C.F.R. § 42.121).
- CC. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 32 (Preliminary Guidance Patent Owner's Motion to Amend).
- DD. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 43 (Patent Owner's Sur-Reply to Petitioner's Reply to Board's Preliminary Guidance Patent Owner's Motion to Amend).
- EE. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 47 (Final Written Decision).
- FF. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 7 (Patent Owner's Preliminary Response Under 37 C.F.R. § 42.107).
- GG. *Satco Prods., Inc. v. Seoul Semiconductor Co., Ltd.*, No. IPR2020-00410, Paper 8 (Decision Granting Institution of Inter Partes Review Under 35 U.S.C. § 314).
- HH. Excerpts of the File History of U.S. Patent No. 9,397,264.
- II. Excerpts of the File History of U.S. Patent No. 9,520,536.
- JJ. Excerpts of the File History of U.S. Patent No. 8,987,772.
- KK. Excerpts of the File History of U.S. Patent No. 8,659,050.

LL.Excerpts of the File History of U.S. Patent No. 9,147,821.

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